

BUILDING IT POLICY PROGRAMS FOR HIGHER EDUCATION

Chris Schreiber

Building IT Policy Programs for Higher Education

2026 Edition

Chris Schreiber

This book is available at https://leanpub.com/campusciso_it_policy

This version was published on 2026-04-27



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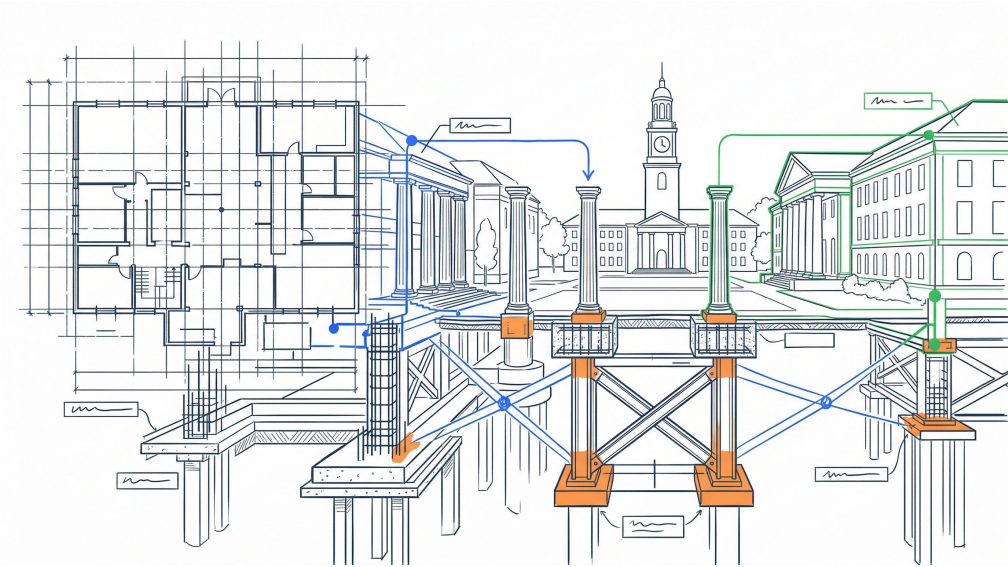
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Executive Summary



You know your policy library has gaps. You just don't know which ones matter most, or how to find them in a timeframe your team can actually afford.

Higher education IT policy isn't a documentation problem. It's a governance problem. Most institutions maintain written policies. But the distance between what should be documented and what exists creates what this guide calls **Governance Debt**. Like deferred maintenance on a building, it follows predictable patterns and compounds over time. Regulations change, threats evolve, and higher education best practices shift each year, while the documentation stays where it was when someone last had time to update it.

This guide shows you how to measure your Governance Debt and pay it down, not through a one-time renovation project but through an annual cycle your team can actually sustain.

How this guide came together. Over years of advisory work with higher education CIOs and CISOs, we kept seeing the same patterns. Some institutions had well-documented authentication programs but nothing written down for

ransomware response. Others had critical technical practices that existed entirely in senior staff members' heads. We started tracking the patterns as reference material for our own engagements. That reference material evolved into the CampusCISO IT Policy Framework. The 2026 edition reflects analysis of 410 institutional policy libraries across every Carnegie tier, including every R1 research university in the United States.

Three core patterns emerged from the institutions we reviewed:

- **The Authentication Floor.** Identity management is the one area where we found near-universal documented practice.
- **The Ransomware Cliff.** Attack volumes against education have nearly doubled in recent years, but we found documented ransomware response procedures at only 57% of Tier 1 (R1) research universities and just 2% of Tier 4 (baccalaureate) institutions.
- **The Oral Tradition Liability.** Critical technical practices live in people's heads instead of written standards. When staff leave, the institution's security program leaves with them.

We defined a framework of 17 policies and 24 standards that reflect what higher education institutions actually do. This was based on observed data from more than 400 institutions, not what a generic framework prescribes.

What you'll know how to do after reading this:

- Identify which policy gaps at your institution create real exposure
- Map your regulatory obligations to the policies and standards that support them, including overlapping requirements that trip up many institutions (FERPA, GLBA, HIPAA, CMMC, NSPM-33, export controls, state breach laws, and the CUI protections now applying to Federal Student Aid data)
- Conduct either a high-level self-assessment in about 20 staff hours or a more thorough roadmap exercise in about 70 to 130 hours
- Establish an annual review and refresh program that fits your team's actual capacity, with a defensible framework to prioritize what to tackle first and what can wait

The goal isn't to fix everything at once. It's to establish the annual cadence that keeps your Governance Debt from compounding.

Who this guide is for: CIOs, CISOs, IT leadership, and governance committees at higher education institutions of any size. While the regulatory examples are US-specific, you can apply the structural principles to institutions in any jurisdiction.

Companion tools: The **CampusCISO IT Policy Framework** summarizes the structure and how it was developed. The **CampusCISO IT Policy Self-Assessment** walks you through evaluating where your institution stands. Both are free downloads at <https://www.campusciso.com/it-policy-guide>.

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Part I: Foundations

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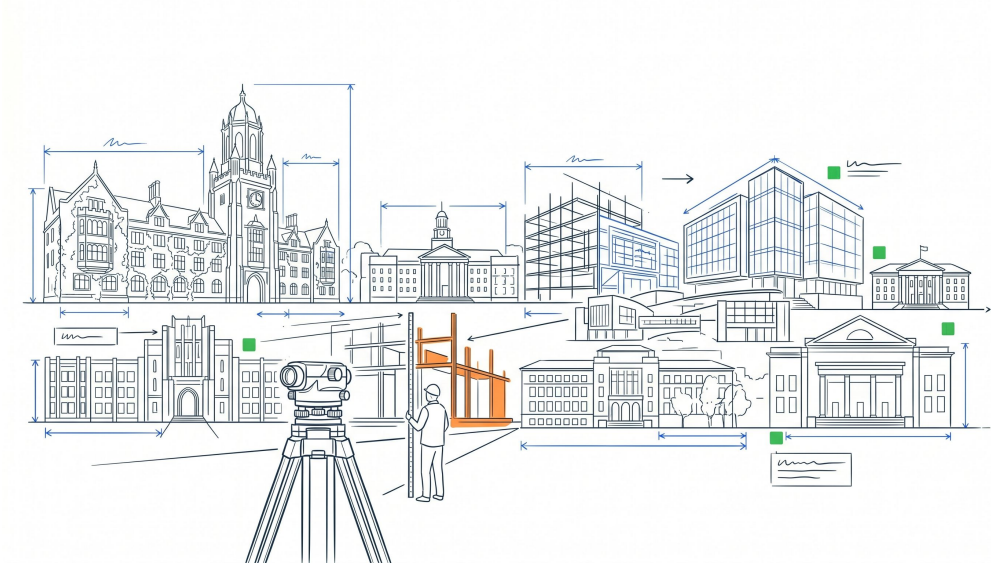
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Chapter 2: The 2026 Policy Landscape



* * *

A Note to Readers: This chapter looks at what higher education actually has in place for IT policies and standards in 2026. The findings come from the 2026 edition of the CampusCISO IT Policy Framework, which incorporates fresh data and insights from our annual research. The framework evolves slowly. The findings in this chapter refresh each year, and this chapter refreshes with them.

A Yearly Snapshot of the Sector

The CampusCISO IT Policy Framework describes the elements of a well-developed higher education IT policy program. This guide shows you how to interpret and apply that framework. This chapter shows you what the sector has actually built against it as of 2026.

We publish a new edition of the framework each year, grounded in fresh research across hundreds of colleges and universities. The 2026 edition draws on 410 institutions, including every R1 research university in the United States. The data behind this chapter comes from that review.

The snapshot changes each year. Ransomware response procedures that appear at 57% of Tier 1 institutions today will appear at a different percentage next year, because more institutions will write them. AI governance policies at 47% today will either climb sharply or stall out, and either outcome tells you something. International Travel Security standards at 6% today are the kind of number that has nowhere to go but up.

Because the numbers move, the chapter moves with them. You're reading the 2026 edition. If you're reading this in 2027 or later, pick up the newer edition for the current measurements. The other chapters in this guide won't have changed much. This one will.

About the Data

Instead of starting with what frameworks tell institutions to do, we looked at what they're doing. For each institution, we identified the policy repository, mapped every document to our framework inventory, and evaluated how their governance structure coordinates security decisions.

2026 Edition Scope: For the 2026 edition, we reviewed 410 institutions from December 2025 through January 2026. This included all 187 R1 research universities (100% coverage) and representative sampling across R2, master's, baccalaureate, and community college tiers. This data established a stan-

standardized framework of 17 policies and 24 standards. As we complete new assessments, the dataset grows and informs future framework updates.

Throughout this guide, we organize institutions into **CampusCISO Institutional Tiers** for benchmarking. CampusCISO uses these tiers across our diagnostic services to provide granularity without identifying specific institutions.

The tiers are currently based on the Carnegie Classification of Institutions of Higher Education, but we designed the system to accommodate non-US institutions in future updates.

CampusCISO Tier	Current Composition (2026 Sample Size)
Tier 1	R1: Doctoral universities, very high research activity (187)
Tier 2	R2/RCU: Doctoral universities, high research activity (86)
Tier 3	Masters and non-research graduate institutions (39)
Tier 4	Baccalaureate colleges (35)
Tier 5	Community and associate's colleges (38)
Special Focus	Specialized and tribal institutions (25)

We mapped the framework against NIST CSF 2.0, NIST SP 800-171, CIS Controls v8, and ISO 27001/27002. The goal is to complement those standards, not compete with them.

This framework has three limitations worth noting.

- The research measures publicly documented policies, so institutions with robust but unpublished policies may appear less developed.
- Assessments reflect a point in time (December 2025 through January 2026).
- The presence of a policy document doesn't guarantee effective implementation.

This framework measures governance architecture, not operational effectiveness.

Implementation Tip: For the full research design and sampling methodology, download the CampusCISO IT Policy Framework at <https://www.campusciso.com/it-policy-guide>.

What we found wasn't a single coherent standard. It was hundreds of institutions solving the same problems in different ways, with different names, unique structures, and varying levels of completeness. We distill those diverse approaches into a common framework of **17 policies** that establish governance authority and institutional intent, plus **24 standards** that specify technical requirements and operational procedures. Each year's research refines the framework as institutional practice evolves. Throughout this book, we'll refer to policies and standards using reference numbers like P-01 for policies and S-01 for standards.

The 2026 edition provides a map of where the sector has built consensus and where critical gaps remain. Some policies are nearly universal. Others are quickly gaining traction but haven't reached critical mass. And some, including ones that federal regulators already ask about, barely exist at all.

Three Patterns That Define the Landscape

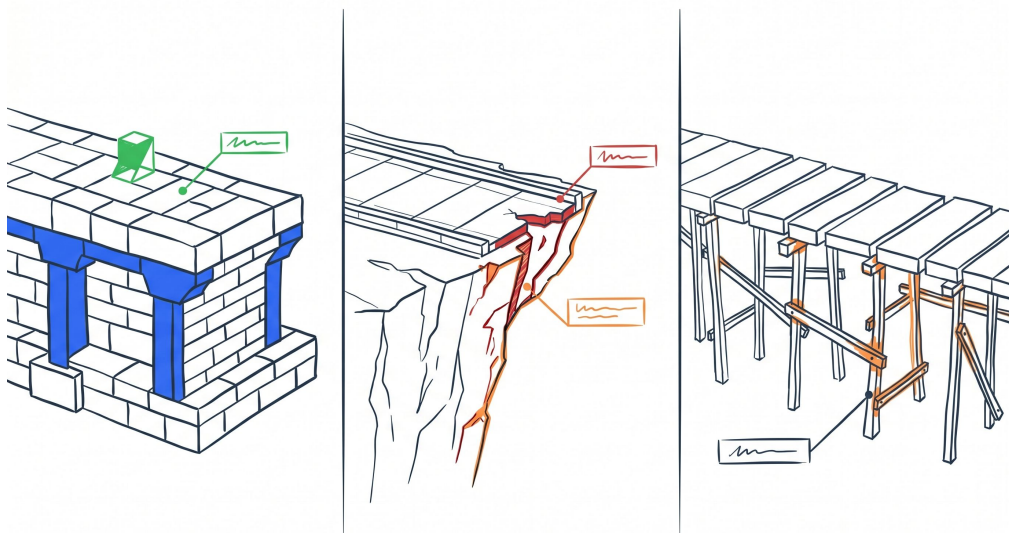


Figure 1. Governance Debt compounds predictably: a strong authentication floor, a sudden ransomware cliff, and fragile oral traditions.

Governance Debt doesn't accumulate evenly. When we analyzed the data, three distinct patterns emerged, each revealing something different about where higher education stands today. You'll probably recognize some of them in your own environment.

The Authentication Floor

Here's the good news: some things are working. Over 80% of institutions at every tier have adopted standards for passwords (S-03) and access controls (S-06). Regardless of size, budget, or complexity, nearly every institution has built at least this much. This is the floor, and it proves that sector-wide consensus on security controls is possible. The question is why so few policies and standards have reached such widespread adoption.

The Ransomware Cliff

You already know cyber threats are getting worse. By Q1 2025, weekly cyber-attacks against the education sector had increased 73% year-over-year. By Q2 2025, education was absorbing an average of 4,388 attacks per week, more than double the global cross-sector average¹. Studies consistently show education is one of the most-attacked sectors globally.

¹Sophos, *The State of Ransomware in Education 2025* (2025).

So how many institutions have documented what to do when ransomware activates at 2 AM? At Tier 1 institutions, 57%. At Tier 2, 41%. At Tier 4 (baccalaureate) institutions, 2%. The institutions most likely to lack dedicated security staff are also the least likely to have written down a response plan.

The Oral Tradition Liability

The backup schedule lives in a sysadmin's head. The patching timeline is "when we get to it." The access review process is "we know who should have an account."

Across the sector, more than 75% of institutions at every tier publish their IT policies to public repositories. But the technical standards that turn those policies into operational practice tell a different story. Published standards drop from 76% at Tier 1 to just 37% at Tier 5. Sometimes the gap reflects documentation hidden behind authentication that an outside assessment can't reach. But in our advisory work with campuses of all sizes, we often find something more fundamental. The documentation either doesn't exist, or it hasn't been updated in years and stays locked away rather than exposing the accumulated Governance Debt.

Governance Debt hits smaller institutions especially hard. Often, one or two people carry the entire operational playbook in their heads. But the principle applies to institutions of all sizes. **When your team doesn't know what's expected, you can't expect the outcomes you need.** Staff turnover erases undocumented practices overnight. Auditors and insurance underwriters can't verify what isn't written down. And decentralized IT units can't follow standards that don't exist in a form they can reference.

The Authentication Floor proves the sector can reach consensus. The other two patterns show where Governance Debt is compounding, and why understanding the current state matters before you start measuring your own institution against it.

Additional Gaps Across the Sector

Beyond the three diagnostic patterns, we identified several additional gaps worth calling out. These are areas where the regulatory environment or the threat landscape has moved faster than institutional documentation.

Research Security Documentation. Federal research security requirements have expanded significantly in recent years. NSPM-33 (National Security Presidential Memorandum 33) arrived in 2021, the CHIPS and Science Act followed in 2022, and CMMC 2.0 took effect in December 2024. Institutional documentation has not kept pace. At Tier 1 institutions, we found International Travel Security (S-24) published at just 6% and Security Exception Management (S-23) at 7%. These are the operational policies that make federal research compliance possible.

AI Governance Policy. At Tier 1, we found documented AI governance policies at 47% of institutions. At Tier 3 (non-research graduate), adoption dropped to 32%. AI tools are everywhere, but governance hasn't caught up. Institutions' exposure to AI risks that affect data protection and academic integrity grows every day.

Third-Party Risk Monitoring. 95% of institutions assess vendors during procurement, but only 15% continue monitoring afterward ². Breaches involving third party providers like MOVEit ³ and Blackbaud ⁴ showed what can happen after the contract is signed.

Zero Trust Architecture. We found a Zero Trust standard at only 7% of Tier 1 institutions, dropping to nearly zero at smaller institutions. Even though 70% of security professionals want training on Zero Trust ⁵, almost no institution has documented strategies.

Identifying policy gaps at your institution may feel overwhelming, but we'll help you prioritize which to correct first.

Interpreting the Data

Two conventions shape how the data in this chapter should be read. The first distinguishes prevalence from applicability. The second defines the prevalence tiers the rest of the book uses.

²EDUCAUSE, "EDUCAUSE QuickPoll Results: Third-Party Risk Management Practices in Higher Education," August 2024, <https://er.educause.edu/articles/2024/8/educause-quickpoll-results-third-party-risk-management-practices-in-higher-education>.

³Dark Reading, "MOVEit Breach Impact on Higher Education," 2023, <https://www.darkreading.com/cyberattacks-data-breaches/moveit-breach-impact-higher-education>.

⁴Inside Higher Ed, "US Institutions Affected by Blackbaud Cyberattack," July 2020, <https://www.insidehighered.com/quicktakes/2020/07/31/us-institutions-affected-blackbaud-cyberattack>.

⁵ISC2, "Zero Trust Skills Gap," June 2024, <https://www.isc2.org/Insights/2024/06/Zero-Trust-Skills-Gap>.

Prevalence vs. Applicability

One important distinction before we go further: this guide shows the “prevalence” of different policies and standards. This represents what percentage of institutions have documented a policy or standard, not how many institutions need one.

For example, we found Identity Theft Prevention (P-16) policies at only 11% of Tier 1 institutions. That doesn’t mean identity theft prevention isn’t important. The FTC Red Flags Rule has required written identity theft prevention programs since 2009 for any institution that extends credit to students (including tuition payment plans). The 11% figure likely means the sector has a policy documentation gap, not that 89% of institutions made a deliberate decision to skip it.

The same logic applies to emerging items like AI Governance (P-12) at 47% and International Travel Security (S-24) at 6%. Low prevalence can show that a requirement is new, that institutions are slow to document existing practices, or that the sector has a genuine blind spot. Low adoption rates don’t make the item optional for your institution. Your regulatory profile (Chapter 4) determines which policies and standards you need. Prevalence data tells you where you stand relative to peers, not where you should stop building.

The Public/Private Divergence

One final pattern worth noting: public institutions consistently show higher policy adoption rates than private institutions. While this may indicate that private institutions are more likely to keep policies and standards behind authentication, that explanation alone doesn’t match the observed data.

At Tier 1, visibility rates are nearly identical: 94% of public institutions and 96% of private institutions publish their policies publicly. But public institutions still score over 6 points higher on average using our 100-point IT policy adoption score. The gap is real. Public institutions face state requirements, shared governance mandates, and public accountability expectations that all push toward formal documentation.

At non-research institutions, the difference between public and private institutions is less clear. Small private institutions are more likely to place

their documentation behind authentication, so our assessment can see less of what they've built. We can't say for certain how wide the public versus private adoption gaps are at those tiers.

The practical takeaway: if you're benchmarking against peers, public institution adoption rates are more reliable across all tiers. Private institution rates should be treated as directional rather than definitive.

Prevalence Tiers

In the framework, we calculate prevalence as the percent of Tier 1 institutions that have publicly published a policy or standard. Prevalence tells you how common an item is across the sector. It doesn't tell you whether that item applies to your institution.

Based on the prevalence data, we divide the IT Policy Framework into three tiers.

Tier	Definition
Universal	Found at 90% or more of Tier 1 institutions. Typically legally or operationally essential.
Common	Found at 50-89% of Tier 1 institutions. Indicators of well-developed security programs.
Emerging	Found at fewer than 50% of Tier 1 institutions. Growing in importance.

Note: We calculated the prevalence rates based on institutions with visible documentation. Any institution that places its policies or standards behind authentication is excluded from the prevalence calculation rather than being counted as missing.

For a more thorough overview of the methodology, see the Research Design

and Scoring chapter of the CampusCISO IT Policy Framework. It's available at <https://www.campusciso.com/it-policy-guide>.

What the Data Leaves Out

The framework measures what's written down. It doesn't measure why.

Why has the sector reached broad consensus on authentication standards but not on ransomware response? Why do 94% of Tier 1 institutions publish policies while only 37% of Tier 5 institutions publish their standards? Why are institutions with the smallest security teams also the least likely to have a documented plan for the threats they face most?

The numbers surface the patterns. They don't explain them.

The rest of the book works on the explanation. Chapter 3 maps the cultural and operational site conditions that shape what higher education institutions can build: shared governance, academic freedom, the open campus, and the dynamics that make university security programs structurally different from anything in the corporate or government playbook. From there, the book walks through framework alignment, the regulatory loads institutions carry, the 41-item inventory in detail, the research enterprise, and the operational model that holds it all together.

The data in this chapter is the starting point. The rest of the book is how you use it.

Chapter 2 Key Takeaways

1. **This chapter is a 2026 snapshot.** The CampusCISO IT Policy Framework evolves slowly, and this guide's interpretation of it is durable. The prevalence figures, three patterns, and additional gaps in this chapter will refresh with each edition of the framework.
2. **Three diagnostic patterns shape the current landscape.** A strong Authentication Floor proves the sector can reach consensus. A steep Ransomware Cliff shows where response documentation falls off at smaller institutions. An Oral Tradition Liability shows where technical practices live in people's heads instead of written standards.
3. **Prevalence is not applicability.** Low adoption of a policy across the sector doesn't make it optional for your institution. Your regulatory profile determines what you need. The data tells you where you stand relative to peers, not where you should stop building.
4. **The data measures governance architecture, not operational effectiveness.** A documented ransomware response plan scores the same as one that's been tested monthly. Whether your backups actually restore, whether your policies are actually followed, and whether your controls actually work are separate questions this data doesn't answer.

Chapter 3 looks at the ground the sector builds on: shared governance, academic freedom, the open campus, and the cultural dynamics that make higher education security programs fundamentally different from anything in the corporate playbook.

* * *

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